

EXHIBIT 4



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Bryson

v.

Rough Country, LLC

REPORT

Report Prepared For:

Prepared By:

Mr. Richard H. Hill, II
Weinberg, Wheeler, Hudgins, Gunn & Dial, LLC
3344 Peachtree Road, NE
Suite 2400
Atlanta, GA 30326

Robert J. Pascarella

March 29, 2024

Dear Mr. Hill:

Per your request, I am submitting this report regarding my opinions in this case to date. I was asked to provide an analysis based upon my knowledge and experience in the automotive industry and my history of employment with Ford.

Background

1. I received my Bachelor of Science degree in Mechanical Engineering from Michigan State University in 1989.
2. I began working for Ford in 1989. To start, I was assigned to what was known as the Ford College Graduate Program. In that program, I rotated through a variety of positions within the company. Then, in 1991, I began working as an engineer in Ford's Vehicle Dynamics department. In general, that department is responsible for the ride handling and steering performance of Ford-built light truck vehicles, including the Ford F-250 and F-350.
3. In 1995, I was promoted to the position of Supervisor of Vehicle Dynamics. From approximately 1997-1998, I was Supervisor of Brake Design in Ford's Chassis & Engineering Department. From approximately 1998 to 2003, I was Supervisor of Vehicle Dynamics and Brake Development for Ford's Super-Duty F-Series, which included the F-250 and F-350 trucks. From 2003 through May 2006, I was a Design Analysis Engineer. From June 2006 through September 2006, I was Application Supervisor in the Roll Stability Control Applications Group.
4. From September 2006 to December 2012, I was employed as a consulting engineer with Tandy Engineering and Associates, Inc., where I conducted accident investigation/reconstruction and vehicle dynamics testing, including evaluation of F-250 and F-350 trucks.
5. In approximately December 2012, I rejoined Ford Motor Company as a Design Analysis Engineer in Ford's Automotive Safety Office ("ASO"). I retired from Ford in October of 2022 and I am now a consulting engineer with Tandy Engineering.
6. As part of my job functions over this time period, I have performed dozens of vehicle dynamic evaluations of Ford F-250 and F-350 vehicles from model years 1999-2020.
7. Through my experience working for Ford, I am familiar with the design and development process for Ford vehicles, including the design and development of 2016 Model Year F-250 and F-350 Super Duty trucks, as it relates to the suspension and steering systems of those vehicles.

8. Tandy Engineering provides consulting services in the areas of, among others, automotive engineering, crash reconstruction, and mechanical design, with an emphasis on vehicle dynamics and chassis, and brake design and development.
9. For 35 years, I have been involved in design and testing of automotive vehicles and components. Most of my professional career has involved chassis design, vehicle dynamics, testing and evaluation of vehicles' dynamic characteristics and performance, and vehicle crash investigation/ reconstruction. I also have extensive experience with customer-level ride and drivability assessments.
10. I have been qualified as an expert witness in areas of suspension, steering, and brake design, vehicle dynamics, and accident reconstruction in both state and federal courts.
11. I have published and/or presented 21 peer-reviewed technical papers in the areas of failure analysis, crash reconstruction, and vehicle dynamics, and have given numerous presentations on these same topics. A complete copy of my Curriculum Vitae and Publications List are attached as Exhibit A. A list of my deposition and trial testimony as an expert over the last four years is attached as Exhibit B.

Case Information

The 2016 Ford F-250 involved in this accident was equipped with a 4 ½ inch Rough Country lift kit, Model #567.20. The lift kit was purchased via Rough Country's website by Will Holloway on June 21, 2016. The lift kit was installed on the F-250 by Ronnie Thompson Ford, an independent Ford dealer, on July 11, 2016. The accident occurred on March 15, 2020.

Opinions

1. At the time of both the installation of the subject lift kit and the time of the subject incident, Ford Motor Company ("Ford") was aware of the existence of aftermarket lift kit manufacturers designing and selling aftermarket lift kits for Ford vehicles, including the Ford F250 involved in this case. In my experience, Ford was aware that some of its independent dealers would install modifications including lift kits on new Ford vehicles at the request of a consumer, as occurred in this case.
2. The warning contained in the owner's manual of the subject Ford F250 related to aftermarket modifications of the suspension, including lift kits, did not pertain to any risk of vehicle-to-vehicle compatibility and/or override or intrusion. The

purpose of the warning was to inform customers that the modified version of the vehicle had not been tested by Ford, and therefore, could affect the performance of the vehicle and its components. It is for that reason that Ford recommends that those modifications not be made. This warning was not intended to be a blanket prohibition or restriction on aftermarket modifications, including lift kits.

Materials Received for Review

- 2016 Ford F-250 Owner's Manual
- 2016 Ford F-250 Warranty Guide
- Service Records from Ronnie Thompson Ford for the subject F-250
- Fannin County Police Incident Report
- GA SCRT Report
- Report of Christopher Roche
- Deposition of Rad Hunsley
- Discovery responses and document production of Rough Country